UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

February 12, 2003

Reply To
Attn Of: ECL-112

Commander, Ft. Lewis *(sent via e-mail and regular mail)*
Directorate of Public Works
ATTN: AFZH-DEQ MS 17 (Mr. Eric Waehling)
Building 2012, Room 323
Ft. Lewis, WA 98433-9500

Subject: *Work Plan for Soil Sampling in Firing Ranges and Demolition Areas 2 and 3, Sampling and Analysis Plan-Soil, Data Management Plan, and Quality Assurance Project Plan Camp Bonneville, Washington, Dated January 6, 2003, Response to Comments dated 2/7/2003.*

Dear Eric:

Thank you for the response to our comment letter dated January 29, 2003. There are a number of comments that were not addressed pertaining to quality assurance; thus we are still awaiting response on comment numbers 21-24, below. Other comments not adequately addressed are also listed.

Please contact me at (206) 553-1220 or at sheldrake.sean@epa.gov with any questions or concerns.

Sincerely,

Sean Sheldrake, Project Manager

Enclosure

cc: Ben Forson, Ecology
Chris Peredney, Ecology
Brian Vincent, Clark County
Karen Kingston, RAB co-chair

Enclosure

Sampling and Analysis Plan - Soil

General Comments

Number 3

"Given that Camp Bonneville is intended for recreational use, it is likely that exposure will occur across an area of at least 2 acres. Similarly, for ecological risk, an area less than 2 acres does not constitute sufficient habitat to pose a significant impact when impaired. "

Response not accepted. Areas less than one acre are significant from both a recreational and ecological perspective; in fact, State and EPA risk assessment guidance specify areas of less than one acre for exposure unit evaluation. Please increase the number of samples to provide sufficient data to make decisions on a per acre basis, rather than for every 2 acres, to ensure that the data gathered is usable..

Number 10

Comment: Update Table 4-3 with the number of duplicate and MS/MSD samples that will be collected to meet the project requirements.

Response: Duplicate samples will be collected at a frequency of ten percent and MS/MSDs will be collected at a frequency of five percent. Duplicate and MS/MSD samples will be collected at specific locations with dummy grid numbers assigned to the duplicate samples. The sample collection frequencies are reflected in Table 4-3:

> "4.7 Sample Schedule
>
> Frequencies listed in Table 4-2 are minimum frequencies. Duplicate samples will be collected at a frequency of ten percent and MS/MSDs will be collected at a frequency of five percent. Duplicate and MS/MSD samples will be collected at specific locations with dummy grid numbers assigned to the duplicate samples. An example of the sample collection frequencies is reflected in Table 4-3 for the 25 Meter M60 Range/Pistol Range."

Response Not Accepted: Lead samples have sufficient MS/MSD and Duplicate samples identified as there are 20 samples in this batch, however Firing Line samples do not have an MS/MSD associated with them, please provide an additional MS/MSD samples for Firing Line Samples in order to meet the 5% criteria stated above. To clarify, if every sample collected is a discrete sample, then it is counted in the batch.

Quality Assurance Project Plan

General Comments

21. The sampling method for VOC's and SVOC's should specify that no mixing of the sample will take place before sample collection and that no head space will be left in the VOC sample vial.

22. In comparison to the "US EPA region 9 Guidance for Preparing Quality Assurance Project Plans for Superfund Remedial Projects," the QAPP is missing the following items:

A signature page for the project manager, quality assurance officer, etc.;
Document control information (specifying plan section, revision number, and date of revision);
Data usage; decisions to be made for which data are needed, uses of data;
Rationale for analytical parameters;
Project Schedule;
Action levels or standards upon which decisions will be made (source or information cited).
Acceptable level of confidence in data necessary for purpose of data;
Individuals responsible for project management, overall quality assurance, organization responsible for laboratory analysis, individual responsible for data validation, etc.;
Organizational chart;
Chain-of-custody form;
Analyte quantitation/detection limits;
Action levels;

Specific Comments

23.
Table 5-1. Page 4. Please define "HPLC." Do you mean High Performance Liquid Chromatography or HPLC?

24.
Table 5-1, Page 4. The table indicates that aqueous samples will be filtered in the field. If samples are filtered then non-filtered samples should also be provided to the laboratory in duplicate of all those that are filtered to determine if any metals are lost during the filtration process.

Waste Management and Minimization Plan
General Comments

25.

This document does not indicate that liquid wastes generated from sampling activities, such as waste rinsate and/or solvents from the decontamination of equipment, will be stored at the site until this liquid waste is analyzed for all contaminants of concern. Please indicate how this waste will be characterized for disposal purposes?